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Supreme Court, U.S.
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No. 95-733

In The

Supreme Court of the United States

October Term, 1995

WILEY STEWART,

Petitioner,

vs.

CITY OF LAKE CHARLES, LAKE CHARLES PLANNING AND ZONING COMMISSION and JAMES E. SUDDUTH, MAYOR OF LAKE CHARLES,

Respondents.

On Petition for Writ of Certiorari to the United States Court of Appeals for the Fifth Circuit

RESPONDENTS' BRIEF IN OPPOSITION

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19 pp

QUESTIONS PRESENTED

The issues presented by the petition of Wiley Stewart are:

1. Whether the Court of Appeals erred in finding no clearly erroneous findings of fact, abuse of discretion or error of law and thereby affirming the opinion of the trial court finding no discriminatory intent in the denial of Stewart's zoning application;

2. Whether the Court of Appeals erred in finding no clearly erroneous findings of fact, abuse of discretion or error of law and thereby affirming the conclusion of the trial court that Stewart failed to establish a prima facie case of discrimination by proof of discriminatory impact or that if a prima facie case had been established, Respondents had shown a legitimate non-discriminatory basis for the denial of Stewart's zoning application.

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RESPONDENTS' BRIEF IN OPPOSITION

Respondents, City of Lake Charles, Lake Charles Planning and Zoning Commission and James E. Sudduth, Mayor of Lake Charles, respectfully request that this Court deny the petition for writ of certiorari which seeks review of the Fifth Circuit's opinion below. That opinion is not reported and is reprinted in the petition for certiorari at Appendix A.

STATUTES INVOLVED

The statutory provision invoked by Petitioner's complaint is the Fair Housing Act, 42 U.S.C. § 3601, *et seq*. The pertinent text of same is set forth in Petitioner's Appendix (Appendix E, pages 1E-18E).

STATEMENT OF THE CASE

Petitioner Stewart filed an Application for a Minor Conditional Use Permit with the City of Lake Charles, the purpose of which Permit was to allow the construction of 36 single family attached units, commonly described as duplexes. Stewart's financing was dependent upon approval of a 90% guarantee of his loan from the Department of Housing and Urban Development. Stewart maintained that he had received verbal assurances or commitments from HUD. In fact, Stewart received no such approval from HUD. Any commitment from HUD must be in writing and the agency is prohibited from making, and does not, in fact, make any verbal commitment. Stewart, at best, had only preliminary conversations with individuals at HUD.

The site plan provided to the City of Lake Charles was very preliminary and lacking in detail. Petitioner's architect admitted that the drawings were preliminary and that Stewart had not even done a preliminary check on the availability of city services, such as water and sewer. As a courtesy to Stewart, the City of Lake Charles, through its Department of Planning and Development, initiated a review by various city departments. The City went forward with his project based on verbal approval from the various departments, even in the absence of Stewart's technical compliance with the Zoning Ordinance.

Stewart had entered a buy sell agreement with the owner of the property involved, the Gray Estate. There was an American Legion Post situated on the northeast corner of the subject property. The Gray Estate contacted that Post regarding encroachment of the Post parking lot on the property it proposed to sell to Stewart. The receipt of this letter triggered opposition to this development.[1]

The opposition was based on a number of concerns. The American Legion Post had been situated on this property for many years. Most of the individuals involved did not even realize, at least at the early stages, that the proposed developer was an African-American. The development of this property by Stewart would remove the parking lot used by the American Legion. This would cause a concurrent traffic problem because the legionnaires would be parking on residential streets. The legionnaires were concerned about the potential loss to their revenue from bingo games sponsored at the Post. These concerns were voiced to the Director of the Department of City Planning, an African-American, and three City Councilmen, one of whom was also an African-American.

The opposition was also concerned with maintaining the residential character of their neighborhood. The homeowners in the area were concerned that the development of an apartment type complex would effect the value of their homes. This is an area of mostly older homes with many retirees. These individuals had purchased their homes in reliance upon the zoning of that area to be single-family residential, and stood to lose substantial

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1. The property for the American Legion Post had been donated by the Gray Estate many years before. There was disagreement between the American Legion Post and the Gray Estate as to whether the area used for parking had been donated, as well. The Gray Estate took the position that the parking lot in question was not part of the original donation and that it was free to sell that property.

equity in their homes if the integrity of that zoning was not maintained. These concerns were not a subterfuge. So real were these concerns that these property owners, at a later date, participated in raising money on behalf of the American Legion Post, to purchase the property from the Gray Estate.

None of these actions was in any way linked to racial animus. There was no evidence identifying the racial balance of potential occupants of this medium income housing. The project was to be financed by HUD. HUD's regulations require that rental units sponsored or insured by HUD be made without consideration of race and HUD imposes no quota regarding the racial composition of the occupants of the development.

The neighborhood involved is a fully integrated neighborhood. Both White and African-American homeowners in the area signed opposition petitions. Even Petitioner Wiley Stewart admitted that he became aware of opposition from African-American residents of this neighborhood. One of the City Councilmen, David Painter, testified that all of the African-Americans who lived in the immediate vicinity of the property joined in the protest and some eventually participated in the fund raising efforts to donate this property to the American Legion Post.

The office of Planning and Development for the City of Lake Charles approved Wiley Stewart's Application for a Minor Conditional Use Permit. This approval was timely appealed by City Councilman, David Painter. At the next Planning and Zoning Commission meeting, a public hearing was held. The Planning and Zoning Commission voted 4-0 to overturn the action of the City Planner and to deny Stewart's Application for a Minor Conditional Use Permit. An appeal was taken of this by Stewart and the matter was placed on the City Council agenda. The City Council voted not to place the matter on the agenda.

The 1990 census indicates that the racial population of Lake Charles was 57.5% White, 41.6 African-American and .9% other. Evidence was introduced of two areas which include the subject property. These areas describe the immediate surroundings. The area near this proposed development had a demographic population of 64% White, 35% African-American to 76% White, 24% African-American. General testimony from numerous witnesses estimated the African-American composition of this neighborhood to range from 25% to 30%. The data indicates that there is a general mix of Whites and African-American residents in the area immediately surrounding this proposed site.

Zoning for residential and other uses is scattered throughout the City of Lake Charles. There are residential zones (such as the one involved here) in both predominately White and predominately African-American neighborhoods.

Zoning in the City of Lake Charles is divided between residential, neighborhood, mixed use, business use and industrial. The types of construction allowed to burden each of these uses is set forth in the Zoning Ordinance. In the various areas zoned as "mixed use" or "business use", Petitioner Stewart could have constructed a 36 or 50 unit complex. These areas are located throughout the City of Lake Charles, both in predominately African-American, predominately White and mixed neighborhoods. If he had elected to construct this development in any of these areas, Stewart would not have been required to obtain any additional authorization from the City of Lake Charles in the form of a Minor Conditional Use Permit or zoning variance. In addition to these areas, Stewart could have constructed a 36 unit project, of the type encompassed by his original Application, in those areas zoned as "neighborhood". These areas are also scattered throughout the City of Lake Charles. Wiley Stewart took no action to consider any alternative site.

Stewart was the only investor in this project and did not have the personal resources to undertake a project with a price tag of $1,750,000 - $2,500,000. He had to receive, at a minimum, a 90% guarantee from HUD. As has been previously noted, he had never received any assurance from HUD. There was no guarantee that Wiley Stewart, as a developer, was going to qualify for a 90% commitment from HUD. HUD had undertaken no market analysis and had no knowledge of whether there was a market for medium income housing in Lake Charles at that time. There was no feasibility study done on behalf of Stewart and no independent verification of the availability of 100% financing, which was required by his Buy-Sell Agreement. Stewart did not hold a license as a general contractor, which would be a requirement for a multi-million dollar project. Stewart held only a local basic contractor's license, which affords a $50,000 project limit. A project of this nature would require a developer to have a State contractor's license, which requires, both state and local level testing and certification. Stewart had never shown an ability to build a project of this magnitude or any ability to meet the financing obligations.

SUMMARY OF ARGUMENT

The petition articulates no compelling reason for the grant of the writ of certiorari. There is no deviation of the Court of Appeals from established Supreme Court precedent or conflict on any important federal question.

Petitioner alleges two factual theories of discrimination. First, he alleges discrimination against him individually, as he is an African-American. Second, he alleges discrimination based upon the potential racial composition of his proposed development.

The lower court, as affirmed by the Fifth Circuit, made a

factual finding that there had been no showing of discrimination in the actions of the City of Lake Charles in dealing with Wiley Stewart. The evidence was actually the opposite. The municipal defendants endeavored to assist Stewart in his application process and the lack of any racial motivation is soundly enforced by the fact that the principal actor for th City of Lake Charles, the Director of Planning and Development, is also an African-American. As to the second of these factual theories, not a scintilla of evidence was introduced to establish the potential racial composition of the 36 unit duplex development. Thus, Stewart failed to establish any prima facie case of disparate impact.

REASONS FOR DENYING THE WRIT

The matter below was a bench trial. The findings of fact of the district judge may be set aside by the Court of Appeals only upon a finding that they are clearly erroneous. *United States v. United States Gypsum Company,* 333 U.S. 364, 395, 68 S. Ct. 525, 542, 92 L. Ed. 746 (1948), *rehearing denied,* 333 U.S. 869, 68 S. Ct. 788, 92 L. Ed. 1147 (1948); *United States v. City of Birmingham, Michigan,* 727 F.2d 560 (1984) (citing *United States v. Gypsum Company, id.*).

A violation of the Fair Housing Act may be proved by establishing either discriminatory intent or by a prima facia proof of discriminatory impact. *In Re Malone,* 592 F. Supp. 1135, 1166 (E.D. Mo. 1984), *aff'd,* 794 F.2d 680. In cases involving proof of discriminatory impact, the test articulated in *McDonald Douglas Corp. v. Green,* 411 U.S. 792, 93 S. Ct. 1817, 36 L. Ed. 2d 668 (1973) has been adopted:

> First, the plaintiff has the burden of proving a prima facie case of discrimination by a preponderance of the evidence. Second, if the

> plaintiff sufficiently establishes a prima facie case, the burden shifts to the defendant to "articulate some legitimate, non-discriminatory reason" for its action. Third, if the defendant satisfies this burden, the plaintiff has the opportunity to prove by a preponderance that the legitimate reasons asserted by the defendant are, in fact, mere pretext.

Secretary, HUD on behalf of Herron v. Blackwell, 908 F.2d 864, 870 (11th Cir. 1990). *See also, Huntington Branch NAACP v. Town of Huntington*, 844 F.2d 926 (2nd Cir. 1988).

In this case, Petitioner argues that the City's handling of his Application for Minor Conditional Use Permit evidenced discrimination. Petitioner argues that the actions of the City evidence some conspiracy to discriminate against him.[2]

Stewart's claims of a discriminatory conspiracy evaporate upon an examination of the applicable zoning ordinances. The Application must be complete and that determination of completeness must be made by the Director.[3] This is the policy

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2. Stewart interpreted innocent events as part of a conspiracy. He complained about the delay in acting on his application. The delay was caused by the inadequacy of his application. Stewart contended that the delay was intentional. He testified that an indicia of this conspiratorial plot was a note written at the bottom of Councilman David Painter's June 22, 1990 objection to Wiley Stewart's original plan for construction of more than 36 units. Stewart testified that the note on this letter stated "Hold all final approval on this application until after the July meeting with David and Chuck.".(a reference to two councilmen). The note actually stated "Hold all final approvals until the matter is fully discussed w/David & Chuck." Wiley Stewart, under cross-examination, agreed that it was possible that he had misread the letter.

3. Section 4-201(3)(a). Petition Appendix H, page 17h.

and procedure followed by the Department of Planning and Development. In their effort to assist Wiley Stewart, the Department did not return this Application to him due to its incompleteness. Rather, they strived to fill in the gaps through their own efforts in contacting various City departments to ascertain the additional information needed to make the Application complete. They acted on the Application at the earliest possible date. Review of this matter by these various City departments was necessary as all Applications for Conditional Uses require a showing that the proposals would not unduly burden essential public facilities and services, including parking spaces, police and fire protection, drainage systems, refuse disposals, water and sewers and the like.[4]

The July 11 Notice of Approval was given in compliance with the Ordinance which requires that City Council members being given notice of approval within seven days of the granting of that approval.[5] On July 17, 1990, David Painter, a member of the City Council, appealed the approval. The Director Ernie Broussard, in compliance with the Procedure of the Planning Commission to hold public hearing on all appeals, issued Notices of Public Hearing and the matter was set for hearing on the next available Planning and Zoning Commission meeting set for August 20, 1990. The decision of the Planning and Zoning Commission to deny Wiley Stewart's Application was set on the agenda meeting for the City Council on August 28, 1990. Clearly, the City followed its normal procedures in dealing with Wiley Stewart's Application. The only variance from these procedures that could remotely be said to exist is one in favor of Wiley Stewart. The Department of Planning and Development could have simply rejected Stewart's Application out of hand and

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4. Section 4-203(2). Petition Appendix H, page 26h.

5. Section 4-201(4)(b)(ii)(bb). Petition Appendix H, page 20h.

required that he do the necessary leg work to comply with the Ordinance. Their fault, if any, was in trying to help Wiley Stewart instead of rigidly applying the Zoning Ordinance and denying his Application.

The trial court specifically found that Stewart's application was incomplete and that the City did comply with its own ordinance in the handling of Wiley Stewart's application. The trial court found that the application was approved on July 11 and that the appeal of this application and the handling of that matter on appeal was in compliance with the Zoning Ordinance, the Court found that the Respondents did not possess an intent to discriminate against Wiley Stewart on the basis of his race or the case of prospective tenants of his proposed development.

As we have shown above, Petitioner's evidence of discrimination is predicated on his subjective misreading of the evidence and misapplication of the Zoning Ordinance. As we have set forth more fully in the Statement of Facts preceding, the motivation of the opposition to this plan was in no way arbitrary. The residents of this area had purchased their homes many years before have relied upon the zoning of this neighborhood to be residential. They merely desired to maintain that neighborhood characteristic. There is no evidence that this was in any type of subterfuge to achieve segregation. The evidence is absolutely to the contrary. This was a fully integrated neighborhood. Nor, did the City have in place any type of zoning procedure which in any way limited developers such as Wiley Stewart. Stated otherwise, there was no prohibition to development within the City of Lake Charles of this type of housing in neighborhoods which are predominately white, or having a white occupancy greater than that of the neighborhood at issue here. The evidence shows that there were areas of the City having a substantially greater percentage of white occupancy (as high as 96.7% and 95.8%) where Wiley Stewart could have built a 36 unit complex without resort to any application for re-zoning.

The evidence further negates any plan of any discriminatory intent. The Director of City Planning, whom Wiley Stewart accuses of participating in this scheme, is African-American. So the Assistant City Attorney who responded to Wiley Stewart's Complaint. Nearly all of the African-American residents in the neighborhood to be immediately affected by this proposed development also opposed the development. The City followed its normal procedure and afforded Wiley Stewart every opportunity to present his Application for a Minor Conditional Use Permit. The City approved an Application for Minor Condition Use for a smaller development located some distance away from the subject site. The only "evidence" of discrimination is Wiley Stewart's unsubstantiated assertions that this was a "all white community", which it was not, and that the opposition to his plan came from "the whites", which it did not. Lastly, it is important to note here, as it is important to note in a disparate impact case, Wiley Stewart failed to introduce any evidence indicating that the availability of housing to minorities was at all affected by the denial of his Application. Even assuming that there was some disparity in the treatment of Wiley Stewart's Application, of which he had established none, the evidence did not prove a violation of the Fair Housing Act by reason of discrimination in the absence of evidence establishing that the denial of this Application had some impact in denying minority residents housing. *Burrell v. City of Kankakee*, 815 F.2d 1127, 1130 (7th Cir. 1987).

Petitioner has pointed to no statement which can be fairly said to be an indicator of racial bias. The inference from the statement of an individual of some racially motivated opposition does not confer racial motive on the City even if that individual holds an elected position. Even when the motivation of one to make a speech or statement can be characterized as suspect, it does not follow the action of the governing body was so motivated. *McCauley v. City of Jacksonville, N.C.*, 739 F. Supp.

278, 282 (E.D.N.C. 1989). *See also, Metropolitan, Etc. v. Village of Arlington Heights,* 558 F.2d 1283, 1292 (7th Cir. 1977), *cert. denied,* 434 U.S. 1025, 98 S. Ct. 1817, 36 L. Ed. 2d 668.

As to the second method of establishing a violation of the Fair Housing Act, discriminatory impact, Petitioner's evidence was non-existent. There was not a scintilla of evidence regarding the probable or potential racial composition of the tenants in this proposed development. Under a disparate impact analysis, a prima facie case is established only by showing that the challenged practice of the defendant "actually or predictably results in racial discrimination; in other words, that it has a discriminatory effect". *Huntington Branch, NAACP v. Town of Huntington, supra* at 934. No evidence was presented in this case. The area involved is an integrated neighborhood having a black to white ratio (in that immediate area) of anywhere between 35% black to 64% white to 25% black, 75% white. This fact is borne out by the black opposition to this particular project. There was no showing that the denial of this Application would have any disparate impact or that it in any way maintained or promoted a segregated housing pattern. The lack of any evidence for which one could infer that a significantly higher percentage of the occupants of their proposed development would be African-American compels a finding that no disparate impact has been proven. *McCauley v. City of Jacksonville, N.C., supra* at 282.

Nor has Petitioner's evidence established any pattern of racial segregation in housing as it pertains to Wiley Stewart's projected project. Even if such segregation pattern is present, that does not establish that a more significant number of African-Americans than already present in this neighborhood would have occupied the subject development such as to give rise to any claim under the Fair Housing Act. *In re Malone, supra* at 1167. In *Metropolitan, Etc. v. Village of Arlington Heights, supra* (frequently referred to as *Arlington II*), the Seventh Circuit dealt

with a federally subsidized low cost housing project on hearing on remand from the United States Supreme Court. The Seventh Circuit determined that a finding of discrimination sufficient to establish a violation of the Act would turn upon proof of the Village's refusal to re-zone for this project *if* it was established that no other land other than the subject property within Arlington Heights was properly zoned for the development. The evidence introduced in this case and which we have already covered at length clearly shows that there were many areas of the city zoned for a similar development. Many of these areas were located in parts of the City of Lake Charles with a substantially greater white occupancy than that surrounding the subject site. Again, the evidence fails to establish any disparate impact. This was the conclusion reached by the trial court in its findings of fact.

Even if Petitioner can be said to have proved a prima facie case, the Respondent are entitled to overcome that case by articulating some legitimate non-discriminatory reason for the challenged practice. *McCauley v. City of Jacksonville, N.C. supra* at 282. *See also, Keith v. Volpe*, 618 F. Supp. 1132, 1148 (D.C. Cal. 1985), *aff'd*, 858 F.2d 467 (9th Cir. 1988).

The Seventh Circuit articulated four critical factors to determine under what circumstances conduct which produces a discriminatory impact but which was taken without discriminatory intent will violate the Fair Housing Act. These are: (1) how strong are the plaintiff's showing of discriminatory effect; (2) is there some evidence of discriminatory intent; (3) what is the defendant's interest in taking the action complained of and, (4) does the plaintiff seek to compel the defendant to affirmatively provide housing for members of minority groups or merely to restrain the defendant from interfering with individual property owners who wish to provide such housing. *Metropolitan, Etc. v. Village of Arlington Heights, supra* at 1290. When we examined these four critical factors, only the last is in

any way in Petitioner's favor. Stewart did seek to restrain the City from interfering to the degree that he sought a change in zoning and did not ask the City of Lake Charles to undertake to construct housing. However, this is offset by the fact that Stewart did seek that the City affirmatively change or make allowance for a use not presently approved by the zoning regulation.

As to each of the remaining critical factors, Petitioner's evidence fails completely. He has made no showing of discriminatory effect. There is no showing that the group effected by this constitutes substantially more African-Americans than whites. The rules of the Department of Housing and Urban Development demand that housing constructed pursuant to the issuance of a HUD letter of guaranty be rented without regard to race and no evidence was introduced regarding the purported impact of the development on this neighborhood. There is additionally no evidence of any discriminatory intent. Obviously, the City's interest in maintaining the consistency of the City's zoning regulation is great. The City is acting within the ambit of its legislatively granted authority. Municipalities have traditionally been afforded wide discretion in zoning. *Village of Belle Terre v. Boraas*, 416 U.S. 1, 94 S. Ct. 1536, 39 L. Ed. 2d 797 (1974). When a governmental body is acting within the ambit of this authority, such discretion must be afforded and there is reluctance to find that this action violates the Fair Housing Act. *Metropolitan, Etc. v. Village of Arlington Heights, supra* at 1293. Therefore, even if we treat Petitioner's prima facie case as having been established, the City's interest in maintaining its zoning rules under the criteria articulated in *Arlington Heights II* establishes that there is no violation of the Fair Housing Act.

Wiley Stewart's case rests solely on his assertions and perceptions of racial hostility. The trial court correctly concluded that there was no evidence other than Stewart's own testimony to support his allegations that race motivated the denial of his

permit. Wiley Stewart's testimony is demonstrably not credible. He characterized this as an all white neighborhood yet the unimpeached evidence drawn from the U.S. Census clearly indicates that it is not. He asserts that all of his opposition came from whites but, the evidence shows that it did not. Stewart maintains that he had secured verbal assurances from HUD in that he would receive a 90% insurance letter of guaranty. Witnesses from HUD testified that no verbal guaranty can be given and that no guaranty could be given regarding what percentage of insurance could be offered to Stewart. Stewart claims he would be the general contractor on this project. However, Stewart does not hold a state license as a contractor. Stewart claimed that he had the ability to be bonded for this size project. Yet, his Answer to Interrogatories, clearly show that he never had qualified for such a bond. Wiley Stewart's testimony was clearly exaggerated and self-serving.

CONCLUSION

This Petition for Certiorari urges only erroneous factual findings or the misapplication of a properly stated rule of law. The petition for certiorari should be denied.

Respectfully submitted,

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